



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 7, 2020

By CM/ECF

Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.  
APR 07 2020

Dated: \_\_\_\_\_

Re: *United States v. Doud,*  
**19 Cr. 285 (GBD)**

Dear Judge Daniels:

In light of the adjournment of the trial date in the above-captioned case from May 11, 2020 to June 29, 2020, the parties respectfully propose the following adjusted schedule for pretrial filings and deadlines. The parties make this proposal jointly.

- April 29: Defense to produce any unproduced Rule 16 materials in its possession as of that date
- May 6: Government to provide Rule 404(b) notice
- May 13: Government to provide expert disclosure(s)
- May 27: Parties to submit proposed requests to charge and voir dire
- June 3: Government to provide its witness list
- June 3: Government to provide its exhibit list
- June 3: Government to provide Jencks Act material
- June 5: Parties to file motions *in limine*
- June 10: Defense to provide expert disclosure(s)
- June 12: Parties to file oppositions to motions *in limine*

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- June 17: Defense to provide witness list
- June 17: Defense to provide Rule 26.2 disclosures

The Government also respectfully requests that the exclusion of time under the Speedy Trial Act, which currently runs until May 11, 2020, be extended until June 29, 2020, in order to allow the parties time to prepare for trial, engage in motion practice, and undertake the other activities described in the pretrial schedule proposed above.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Nicolas Roos/Max Nicholas  
Assistant United States Attorneys  
Tel: (212) 637-2421/1565